

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

**INTERNATIONAL SHIPHOLDING
CORPORATION, *et al.*,**

Debtors
-----X

Chapter 11

**Case No. 16-12220 (SMB)
Jointly Administered**

Hon. Stuart M. Bernstein

**SUPPLEMENTAL OBJECTION OF BMO HARRIS
EQUIPMENT FINANCE CO. TO CONFIRMATION OF PLAN**

BMO Harris Equipment Finance Company (“**BMO**”), creditor of International Shipholding Corporation and Sulphur Carriers, Inc., submits this Supplemental Objection to Confirmation of the Debtors’¹ Plan (Doc. no. 506), for the following reasons.

BMO objects to confirmation of the Plan for those reasons set forth in the prior Objection filed on behalf of BMO on February 9, 2017 (Doc. no. 614) (the “**Objection**”). Additionally, pursuant to the *Management Agreement between Sulphur Carriers, Inc. and LMS Shipmanagement, Inc.* dated January 1, 2000 which was first produced in the above matters on Thursday, February 16, 2016, the estate of LMS Shipmanagement, Inc. is also liable for the administrative priority claims set forth in the Objection.

BMO therefore requests, for the reasons set forth herein and in the attached Memorandum, that confirmation be denied unless and until adequate treatment of such administrative claims and

¹ The Debtors, and their federal tax identification numbers, are: International Shipholding Corp. (9662); Enterprise Ship Co. (9059); Sulphur Carriers, Inc. (8965); Central Gulf Lines, Inc. (8979); Coastal Carriers, Inc. (6278); Waterman Steamship Corporation (0640); N.W. Johnsen & Co., Inc. (8006); LMS Shipmanagement, Inc. (0660); U.S. United Ocean Services, LLC (1160); Mary Ann Hudson, LLC (8478); Sheila McDevitt, LLC (8380); Tower LLC (6755); Frascati Shops, Inc. (7875); Gulf South Shipping PTE LTD (8628); LCI Shipholdings, Inc. (8094); Dry Bulk Australia LTD (5383); Dry Bulk Americas LTD (6494); and Marco Shipping Company PTE LTD (4570).

secured claims are provided.

Respectfully Submitted,

LUGENBUHL, WHEATON, PECK,
RANKIN & HUBBARD

/s/ Christopher T. Caplinger
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*Counsel for BMO Harris Equipment Finance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2017, I caused a true and correct copy of this pleading to be served on counsel for the Debtors, David H. Botter, Esq., Akin, Gump, Strauss, Hauer & Feld, LLP, One Bryant Park, New York, NY 10036 and the Office of the U.S. Trustee, Serene K. Nakano, Esq., U.S. Federal Office Bldg., 201 Varick Street, Room 1006, New York, NY 10004, and those noted on the attached service list *via* first class mail or e-mail. Additionally, the foregoing was filed through the Case Management/Electronic Case Filing System (“*CM/ECF System*”) and was therefore served on registered users of the CM/ECF System designate to receive electronic notice of events in this case in accordance with General Order No. 399 of the United States Bankruptcy Court for the Southern District of New York and Federal Rule of Bankruptcy Procedure 9036.

/s/ Christopher T. Caplinger

DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
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In re International Shipholding Corp., et al.

Master Service List

Case No. 16-12220 (SMB)

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